

DEFENSE LOGISTICS AGENCY
AMERICA'S COMBAT LOGISTICS SUPPORT AGENCY

**Partners in Environmental Technology
Technical Symposium & Workshop
Nov 29 – Dec 1, 2011**

**Technical Session 1B: National and International
Regulatory Impacts on DoD Operations: Refining the
Goals of DoD's Strategic Plan for "REACH"**

**Impact of Inconsistent Regulatory Requirements at
National Levels – HMIRS Short Term Assistance.**

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Report Documentation Page				Form Approved OMB No. 0704-0188	
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1. REPORT DATE NOV 2011		2. REPORT TYPE		3. DATES COVERED 00-00-2011 to 00-00-2011	
4. TITLE AND SUBTITLE Impact of Inconsistent Regulatory Requirements at National Levels - HMIRS Short Term Assistance.				5a. CONTRACT NUMBER	
				5b. GRANT NUMBER	
				5c. PROGRAM ELEMENT NUMBER	
6. AUTHOR(S)				5d. PROJECT NUMBER	
				5e. TASK NUMBER	
				5f. WORK UNIT NUMBER	
7. PERFORMING ORGANIZATION NAME(S) AND ADDRESS(ES) Defense Logistics Agency -Aviation,Attn: DSCR-VBB,8000 Jefferson-Davis Highway,Richmond,VA,23297-5000				8. PERFORMING ORGANIZATION REPORT NUMBER	
9. SPONSORING/MONITORING AGENCY NAME(S) AND ADDRESS(ES)				10. SPONSOR/MONITOR'S ACRONYM(S)	
				11. SPONSOR/MONITOR'S REPORT NUMBER(S)	
12. DISTRIBUTION/AVAILABILITY STATEMENT Approved for public release; distribution unlimited					
13. SUPPLEMENTARY NOTES Presented at the Partners in Environmental Technology Technical Symposium & Workshop, 29 Nov ? 1 Dec 2011, Washington, DC. Sponsored by SERDP and ESTCP.					
14. ABSTRACT With the advent of REACH implementation in the EU, the logistics system has been presented with a number of challenging conditions due to the dramatic variations in hazardous materials regulations in the U.S. regarding information on the MSDSs/SDSs. Changes are being made to the Hazardous Materials Information Resource System (HMIRS), in conjunction with EU COM to provide a short term remedy. Of particular concern at the moment is the Classification, Labeling and Packaging portion of the Globally Harmonized System (GHS) being involved under REACH. The short-term aids being implemented in HMIRS will be identified which should be helpful until the U.S. regulations become more closely aligned than they presently are.					
15. SUBJECT TERMS					
16. SECURITY CLASSIFICATION OF:			17. LIMITATION OF ABSTRACT Same as Report (SAR)	18. NUMBER OF PAGES 7	19a. NAME OF RESPONSIBLE PERSON
a. REPORT unclassified	b. ABSTRACT unclassified	c. THIS PAGE unclassified			

CHALLENGES WITH INCONSISTENT NATIONAL HAZMAT REGULATIONS

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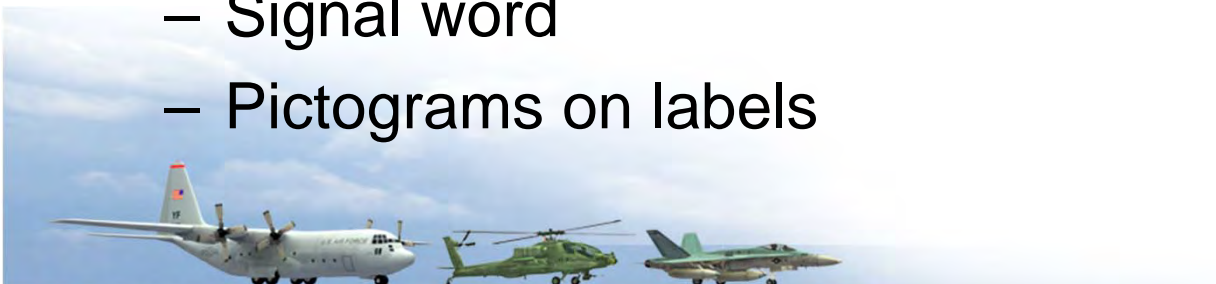
Greatest Impact on DoD Today

- US vs. EU
- Areas of greatest impact/variances
 - MSDS/SDS
 - Safety warning labels
 - Hazard classification methodologies



Data Differences

- US OSHA HAZCOM
 - MSDS
 - Information based on known data or testing
 - Workplace hazard only
- EU SDS – GHS/CLP – mandatory information
 - Product assessment for health and environment
 - Hazard class and category
 - Precautionary statements
 - Hazard statement
 - Signal word
 - Pictograms on labels





Implementation Schedules

- US
 - Awaiting final rule from OSHA incorporating GHS into HAZCOM standard.
- EU
 - Implementing GHS/CLP now for pure substances
 - Will implement requirements for chemical formulations in the future.





Impacts on DoD Operations

- Pure substances from the US with HAZCOM complaint MSDS and warning label not compliant for use/transport in EU.
- Pure substances imported to US, produced in GHS implementing countries have documentation inconsistent with HAZCOM STD or understood by US workforce.
- Costs of accommodating variant requirements in a global operation.





Short Term “Bridging” Capability Plans

- Hazardous Material Information Resource System (HMIRS) evolving to:
 - Accommodate EU GHS/CLP information
 - Support EUCOM compliance efforts
 - HMIRS changes available in May/June 2012

